



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SLR:JHK
F.#2014V02219

*610 Federal Plaza
Central Islip, New York 11722*

April 1, 2016

VIA ECF

Honorable Anne Y. Shields
United States Magistrate Judge
Eastern District of New York
Long Island Federal Courthouse
Central Islip, New York 11722

Re: USMMAAAF v. United States Department of Transportation et al.
Civil Action No. 14 CV 5332 (DeArcy Hall, J.) (Shields, M.J.)

Dear Magistrate Judge Shields:

This Office represents Defendants United States Department of Transportation (“DOT”) and the Maritime Administration, an operating administration of DOT (“Defendants”), in the above-referenced Freedom of Information Act (“FOIA”) action. Defendants respectfully submit this letter on behalf of the parties to request a status conference with the Court. Should the Court be available, the parties respectfully propose April 26-27, May 3-4 or 10-11, 2016.

Since the parties’ late October 2015 conference with the Court, plaintiff has identified several dozen documents (totaling approximately 600 pages) with which it takes issue. Defendants reviewed these documents and disclosed additional material on some. On others Defendants adhered to the redactions made pursuant to the exemptions set forth in the FOIA. However, given the universe of document produced pursuant to plaintiff in response to its eleven multi-part FOIA requests (over 55,000 pages, with a Vaughn index that is nearly four thousand pages), any motion practice at this juncture would be wide-ranging and unwieldy. Put simply,

the process with which plaintiff agreed to engage has yielded little in the way of identifying and narrowing issues for motion practice.

Under these circumstances, the parties respectfully request a conference to explore the options for proceeding subject to the Court's availability on the dates set forth above. Thank you for Your Honor's consideration of this application.

Respectfully submitted,

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cc: VIA ECF
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